

UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING

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2013 JUN 21 AM 10 36

STEPHAN HARRIS, CLERK
CHEYENNE

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

MAYA LATOYA WILTZ

CASE NUMBER: 13-MJ-108-S

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

Between on or about June 17 and June 18, 2013, in the District of Wyoming, Defendant, **MAYA LATOYA WILTZ**, did knowingly, with intent to defraud, did attempt to use an unauthorized access device at various financial institutions, that is a VISA ending in 4824, which had been stolen and cancelled, and attempted to obtain funds aggregating \$1000 or more on those dates.

In violation of 18 U.S.C. § 1029(a)(2), (b)(1), and 18 U.S.C. § 1029 (c)(1)(A)(i).

I further state that I am a Special Agent and that this complaint is based on the following facts:

**SEE ATTACHED AFFIDAVIT OF SPECIAL AGENT
PAUL A. KANISH II**

Continued on the attached sheet and made a part hereof: Yes No



Signature of Complainant
Paul A. Kanish II

Sworn to before me and subscribed in my presence,

June 21, 2013

at

Cheyenne, Wyoming

Date

City and State

Hon. Kelly H. Rankin
United States Magistrate Judge

Name & Title of Judicial Officer


Signature of Judicial Officer

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
SPECIAL AGENT PAUL A. KANISH II
U.S. v. MAYA LATOYA WILTZ**

1. Your Affiant is a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and has been employed by the FBI since May 6, 2012. Your Affiant completed New Agent Training in Quantico, Virginia on September 19, 2012, after which your Affiant was assigned to the Cheyenne, Wyoming, Resident Agency of the FBI, where your Affiant is responsible for investigating violations of federal law. Prior to being employed as a Special Agent for the FBI, your Affiant served in the United States Army for 12 years, during which your Affiant served as a Military Intelligence Officer at the rank of Captain.

2. This affidavit is being submitted for the limited purpose of establishing probable cause in support of the attached application for a criminal complaint and arrest warrant, and therefore contains only a summary of the relevant facts. Your Affiant has not included each and every fact known to him concerning this investigation. Your Affiant knows the following information through investigation, interviews, database checks and conversing with other law enforcement personnel.

3. On June 17, 2013, a woman identifying herself as "Linda Kahle" checked in at the Holiday Inn, 204 South 30th, Laramie, Wyoming 82070. "Kahle" used a Wells Fargo issued VISA credit card ending in 4824 to pay for two rooms. "Kahle" listed an address in Fort Myers, Florida. In addition to the room charges, the VISA was used at the restaurant inside the Holiday Inn. A total of approximately \$250.00 was charged to the VISA card. On June 18, 2013, the charges were denied by Wells Fargo and the card was determined to be invalid. By the time Holiday Inn personnel learned the VISA card was invalid, "Kahle" had checked out of the hotel.

4. On June 18, 2013, at approximately 1230hours (MDT), an unknown black female entered the First Interstate Bank located at 1771 Snowy Range Road, Laramie, Wyoming 82070, and chose to speak with a younger male teller as opposed to the manager. The unknown black female asked for a \$6500 cash advance on her Wells Fargo VISA card. To process the transfer, the unknown black female called the phone number 800-824-5850 and gave the telephone to the teller. The First Interstate Bank teller thought the number called was to the Wells Fargo Bank. The First Interstate Bank teller spoke with an individual whom he believed to be a Wells Fargo Bank employee. The unidentified individual advised the teller that the credit limit on the card was \$9,500.00 but that the customer was requesting a cash advance in the amount of \$6,500.00. Upon hanging up with the alleged Wells Fargo Bank employee, the First Interstate teller advised the unknown black female that bank policy only allowed for a cash transfer up to \$5,000. The unknown black female left the bank without receiving any cash advance.

5. The unknown black female was seen entering a dark colored minivan with a license plate number of 875FHB, however the witness could not determine the state of origin.

6. On June 18, 2013, at approximately 1326hours (MDT), an unknown black female entered the American National Bank located at 6020 Yellowstone Road, Cheyenne, Wyoming 82009, and requested a \$6500 cash advance on her Wells Fargo VISA Card. The unknown black female had the teller speak with an individual over the phone that the teller believed was a Wells Fargo representative. The teller was told by the person on the phone to swipe the card; the card was declined. The teller informed the person on the phone that the card could not be run more than once.

The person on the phone told the teller to inform the unknown black female that an advance could not be placed on the card for the next 24 hours. The unknown black female then left the bank.

7. The unknown black female was seen entering a black Town and Country Chrysler minivan with a license plate number of 875, last characters unknown.

8. Three (3) images of the unknown black female in American National Bank are attached and labeled attachments "A", "B", and "C".

9. On June 18, 2013, at approximately 1334hours (MDT), an unknown black female entered the First Education Federal Credit Union located at 120 West Carlson Street, Cheyenne, Wyoming 82009. The unknown black female inquired about any fees that would be incurred on a cash advance to her (unknown black female) Wells Fargo VISA card. The unknown black female called a number which she said was to Wells Fargo Bank. No mention was made of a figure the unknown black female was requesting for a cash advance. The teller told the unknown black female that there was a \$3,000 limit on cash advances. The unknown black female then left the credit union. The unknown black female was described as having a piercing under her bottom lip on her left side.

10. First Education Bank personnel observed the unknown black female entering a black, Town and Country Chrysler minivan with State of Oregon license plate number 875FHB. An image of the rear of the vehicle with its license plate in the First Education Federal Credit Union parking lot is attached and labeled as attachment "D".

11. Five (5) images of the unknown black female in First Education Federal Credit Union on June 18, 2013 are attached and labeled attachments "E", "F", "G", "H", and "I".

12. Your Affiant reviewed attachments "A", "B", "C", "E", "F", "G", "H", and "I" of the unknown black female. It appeared to your Affiant that the unknown black female's hair style, facial features, clothing, and handbag were similar in all of the images from First Education Federal Credit Union and American National Bank.

13. On June 18, 2013, your Affiant learned that State of Oregon license 875FHB is registered to an Enterprise rental vehicle, a black Town and Country Chrysler minivan.

14. On June 18, 2013, your Affiant contacted a representative of Enterprise Car Rental regarding the Chrysler minivan bearing Oregon license 875FHB. Your Affiant was told that on June 17, 2013, the vehicle was rented from Enterprise Rental Car at 4290 West 3500 South, West Valley City, Utah 84120, by a woman using the name "Linda Kahle". The vehicle is scheduled to be returned at the same location on July 1, 2013. "Kahle" provided a Florida driver's license, # S887987974998, a date of birth of August 27, 1982, an address in Fort Myers, Florida, and telephone numbers 563-528-3644 and 209-450-1086. "Kahle" used a Wells Fargo VISA card number ending in 4824 to pay for the car rental.

15. On June 18, 2013, at approximately 1813hours (MDT), Wells Fargo VISA card number ending in 4824 was used by "Linda Kahle" to reserve a room for the night at the Embassy Suites, Denver Southeast, located at 7525 East Hampden Avenue, Denver, Colorado 80231. When "Kahle" checked into the hotel she was accompanied by two unknown black males and one unknown black female. A tab of at least \$800 was run on the room before "Kahle" left the hotel on June 19, 2013.

16. Two (2) images of "Linda Kahle" registering in the Embassy Suites Hotel are attached and labeled attachments "J" and "K".

17. Two (2) images of "Linda Kahle" and the unknown black female accompanying her (Kahle) at the Embassy Suites Hotel are attached and labeled attachments "L" and "M".

18. Your Affiant reviewed attachments "A", "B", "C", "E", "F", "G", "H", and "I" of the unknown black female from First Education Federal Credit Union and American National Bank in addition to the attachments "J", "K", "L", and "M" of "Linda Kahle" at the Embassy Suites. It appeared to your Affiant that the black female purporting to be "Linda Kahle", who checked into the Embassy Suites, was the same person as the unknown black female from First Education Federal Credit Union and American National Bank. The hair style, facial features, clothing, and handbag were similar in all of the images from First Education Federal Credit Union, American National Bank, and the Embassy Suites.

19. Four (4) images of the two unknown black males accompanying "Linda Kahle" at the Embassy Suites Hotel are attached and labeled attachments "N", "O", "P", and "Q".

20. On the afternoon of June 19, 2013, records checks confirmed that the VISA credit card number ending in 4824 belonged to Wells Fargo customer Linda Kahle, and it was reported stolen in January 2013.

21. On June 19, 2013, your Affiant caused a search of the State of Florida driver's license database to be conducted. The database search confirmed that the Florida driver's license, # S887987974998, used by the black unknown female purporting to be "Linda Kahle", was invalid and no records were found.

22. On June 19, 2013, your Affiant conducted a records check using the National Data Exchange (N-DEx) Program, which linked the telephone number 563-528-3644 to a **MAYA LATOYA WILTZ**, date of birth August 27, 1982. Your Affiant compared the California driver's license photo of **WILTZ** with bank surveillance images of the unknown black female who had been to various financial institutions in Wyoming, and believed them to be the same person.

23. Your Affiant obtained a copy of State of California driver's license, # D2373761. The driver's license is issued to **MAYA LATOYA WILTZ**. **WILTZ** is described as 5'8", 120lbs, brown eyes, and black hair. **WILTZ** has a date of birth of August 27, 1982 and an address of 1617 Boothe Road, Ceres, California 95307. The photograph date was April 11, 2012. The photograph also shows a piercing under **WILTZ**'s left lip. **WILTZ**'s California Driver's License information is attached and labeled attachment "R".

24. Your Affiant compared attachment "R" to attachments "A", "B", "C", "E", "F", "G", "H", "I", "J", "K", "L", and "M" as well as the descriptions in paragraphs nine and thirteen. It appeared to your Affiant that the unknown black female from First Education Federal Credit Union and American National Bank as well as the woman identifying herself as "Linda Kahle" are the same person as **MAYA LATOYA WILTZ**.

25. Between June 18 and 19, 2013, **WILTZ** attempted to fraudulently obtain approximately \$13,000 from First Interstate Bank in Laramie, Wyoming, and American National Bank, in Cheyenne, Wyoming, which is an aggregate of over \$1000 within a one year time period.

26. On June 19, 2013, your Affiant learned that "Linda Kahle" had checked into a Best Western motel in Hays, Kansas, accompanied by two unknown black males. "Kahle" had checked

into the room using the Wells Fargo VISA credit card ending in 4824. A Hays police detective reviewed footage of the check-in. "Linda Kahle" went to the counter and registered for two rooms. A short time later, "Kahle" was seen entering the back entrance of the motel with two unknown black males and one unknown black female. Hays police officers set up surveillance of the motel beginning the afternoon of June 20, 2013. The motel manager stated that the two black unknown males were in a room, and had hung out a "Do not disturb" sign. They were still in the room as of 9:00am MDT on June 21, 2013. No women have been seen in the vicinity of the room, nor has the black Chrysler minivan been located.

27. Your Affiant has confirmed that all of the financial institutions mentioned in this affidavit, including Wells Fargo Bank, American National Bank, and First Interstate Bank have activities which affect interstate commerce. Furthermore, the movements of **WILTZ** have affected interstate commerce, from the rental of the Chrysler minivan in Utah, to her travels through Wyoming, Colorado, and Kansas.

28. Based upon the foregoing, your Affiant respectfully submits there is probable cause to believe that a federal crime has been committed, namely a violation of Title 18, United States Code, Sections 1029(a)(2) and (b)(1).

END OF AFFIDAVIT